

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN

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In re:

Timothy VanDreel,

Bankruptcy Case  
No. 20-22440

Debtor(s).

Chapter 13

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**OBJECTION TO THE TRUSTEE'S MOTION TO DISMISS**

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Come now the debtor(s), Timothy VanDreel, by his attorney, John A. Foscato, and opposes the granting of the Trustee's Motion to Dismiss and state the following:

1. That the debtor has now provided the trustee with copies of his 2020 & 2021 income tax returns.
2. That the debtor fell behind on payments because of medical issues.
3. That the debtor has the ability to resume making his scheduled plan payments in May of 2022 and to extend his plan if needed to maintain feasibility.

PLEASE TAKE NOTICE that a hearing will be held via telephone before the Honorable Beth E. Hanan, United States Bankruptcy Judge, on April 26, 2022 at 10:30 a.m., to consider the debtor's objection to the trustee's motion to dismiss. **To appear by telephone, you must call the Court conference line at 1-888-808-6929, access code 9122579 before the scheduled hearing time** Please note that the Court may already be in session, so please wait quietly on the telephone for your case to be called. The Debtor is welcome, but not required to participate in this hearing.

Dated this 6th day of April, 2022.

LAW OFFICES OF JOHN A. FOSCATO, S.C.

By: /s/ John A. Foscato  
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